

**VERMONT SECRETARY OF STATE****Corporations Division**

MAILING ADDRESS: Vermont Secretary of State, 128 State Street, Montpelier, VT 05633-1104

DELIVERY ADDRESS: Vermont Secretary of State, 128 State Street, Montpelier, VT 05633-1104

PHONE: 802-828-2386

WEBSITE: [www.sec.state.vt.us](http://www.sec.state.vt.us)**1. Acknowledgement Information.**

- a. **Name:** Todd Shaul
- b. **Acknowledgement Address:** 10000 W. Charleston Blvd., Suite 200, Las Vegas, NV, 89135, USA
- c. **Email Address:** tshaul@collegeloan.com
- d. **Phone No:** (888) 972-1010

**2. Data Broker Information.**

- a. **Name:** Edvisors Network, Inc.
- b. **Primary Physical Address:** 10000 W. Charleston Blvd., Suite 200, Las Vegas, NV, 89135, USA
- c. **Primary Email Address:** tshaul@collegeloan.com
- d. **Primary Internet Address (URL):** edvisors.com

**3. Does the data broker permit a consumer to opt out of the data broker's collection of brokered personal information, opt out of its databases or opt out of certain sales of data? ☒ Yes ☐ No***If so:***a. What was the method for requesting an opt-out?**

Edvisors provides information relative to consumer opt-out in our Privacy Policy. Consumers are able to submit their request to opt out through a webpage <https://www.edvisors.com/third-party-opt-out/> which was created to provide a consumer the ability to opt out of sharing and/or selling their personal information. We also honor opt out requests if submitted in any other manner, e.g., email or chat.

**b. If the opt-out applied to only certain activities or sales, which ones?**

A consumer can opt out of sharing and/or selling all of their personal information. We do not limit a consumer's ability to opt out of specific activities or sales.

**c. Does the data broker permit a consumer to authorize a third party to perform the opt-out on the consumer's behalf?**

We currently do not have any policies which address this issue, and we would not be immune to implementing a formal policy which allows for a third party to perform an opt-out on the consumer's behalf. This formal policy would encompass Edvisors receiving verifiable permission from the underlying party.

**4. Statement specifying the data collection, databases or sales activities from which a consumer may not have opted out during the prior year:**

N/A, this does not apply as a user always has the option to opt-out.

**5. Statement regarding whether the data broker implemented a purchaser credentialing process during the prior year:**

Prior to providing any data to a potential client/purchaser, Edvisors conducts a rigorous due diligence process to ensure we know who we are selling the data to. Also, we execute with the buying entity a detailed Data Master Service Agreement outlining exactly how the data will be used. In addition, we include contract provisions that mandate that the buying entity use the data only for the purposes for which intended.

**6. The number of security breaches that the data broker experienced during the prior year: 0 .**

**Total number of consumers affected by the breaches:** 0 .



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**7. Where the data broker has actual knowledge that it possesses the brokered personal information of minors, provide a statement detailing the data collection practices, databases, sales activities, and opt-out policies that are applicable to the brokered personal information of minors:**

We do not collect, share or sell data on minors under the age of 13. We have processes in place for adherence to COPPA ("Children's Online Privacy Act").

**8. Any additional information or explanation the data broker chooses to provide concerning its data collection practices during the prior year:**

Our Privacy Policy Notice is prominently displayed across all of our websites. Our Privacy Policy Notice provides the consumer with notice of our data collection and sharing practices. In addition to providing a consumer with the ability to opt –out, we offer the consumer the ability to update and edit their personal information.

**9. Certification of Annual Registration.**

I hereby certify, under penalty of law (13 V.S.A. Ch. 65), as an authorized representative of the data broker, that the all of the above information is accurate.

Todd Shaul

PRINTED NAME

Todd Shaul

SIGNATURE

01/18/2019

DATE